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15 Attorneys for PLAINTIFF
ROBERT HUNTER BIDEN

16 **UNITED STATES DISTRICT COURT**
17 **CENTRAL DISTRICT OF CALIFORNIA**
18 **WESTERN DIVISION**

19 ROBERT HUNTER BIDEN, an
20 individual,

21 Plaintiff,

22 vs.

23 PATRICK M. BYRNE, an individual,
24 Defendant.

Case No. 2:23-cv-09430-SVW-PD

**PLAINTIFF ROBERT HUNTER
BIDEN'S REQUEST FOR
COUNSEL TO APPEAR
REMOTELY FOR NOVEMBER 25,
2024 FINAL PRETRIAL
CONFERENCE; DECLARATION
OF ABBE D. LOWELL;
[PROPOSED] ORDER**

Date: November 25, 2024
Time: 3:00 P.M.
Place: Ctrm. 10A

Judge: Hon. Stephen V. Wilson

28 5794292.1

**PLAINTIFF ROBERT HUNTER BIDEN'S REQUEST FOR COUNSEL TO APPEAR REMOTELY FOR
NOVEMBER 25, 2024 FINAL PRETRIAL CONFERENCE; DECLARATION OF ABBE D. LOWELL;
[PROPOSED] ORDER**



EARLY
SULLIVAN
WRIGHT
GIZER &
McRAE LLP
ATTORNEYS AT LAW

1 **TO THE HONORABLE COURT, ALL PARTIES AND THEIR**
2 **ATTORNEYS OF RECORD**, Plaintiff Robert Hunter Biden (“Plaintiff”) hereby
3 respectfully requests permission from this Court for his Counsel, Abbe D. Lowell, to
4 appear remotely by way of videoconference (e.g. Zoom) for the Final Pretrial
5 Conference scheduled in this case for November 25, 2024 at 3:00 p.m. Good cause
6 exists to grant this request because Mr. Lowell has been involved in the disposition
7 of the dispute regarding Defendant’s deposition scheduling and his participation
8 would be helpful if the Court has specific questions on that issue. (*See* Declaration
9 of Abbe D. Lowell, at ¶2.) Mr. Lowell will be out of the state of California on
10 November 25, 2024, and given Mr. Lowell’s limited participation in the Final Pretrial
11 Conference, it did not make sense for Plaintiff to undertake the expense for Mr.
12 Lowell to travel to California to appear in person for this Final Pretrial Conference.
13 (*See* Declaration of Abbe D. Lowell, at ¶3.) Additionally, Mr. Lowell’s co-counsel,
14 Bryan M. Sullivan and Zachary C. Hansen, will be appearing in person for the Final
15 Pretrial Conference, so Plaintiff will already have two other attorneys present for this
16 hearing. (*Id.*) Accordingly, Defendants respectfully request that the Court grant this
17 request for Mr. Lowell to appear remotely by videoconference at the November 25,
18 2024 Final Pretrial Conference in this matter.

19
20 Dated: November 21, 2024

EARLY SULLIVAN WRIGHT
GIZER & MCRAE LLP

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22
23 By: /s/ Zachary C. Hansen

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[PROPOSED] ORDER**



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Attorney for Plaintiff
Robert Hunter Biden

DECLARATION OF ABBE D. LOWELL

I, Abbe D. Lowell, declare and state as follows:

1. I am counsel of record for Plaintiff Robert Hunter Biden (“Plaintiff”) in the above-entitled action and am over the age of 18. I hereby submit this declaration in support of Plaintiff’s Request for Counsel to Appear Remotely for November 25, 2024 Final Pretrial Conference. If called as a witness, I would and could testify to the matters contained herein.

2. I have been involved in disposition of the dispute regarding Defendant’s deposition scheduling and I believe my participation in the Final Pretrial Conference would be helpful if the Court has specific questions on that issue.

3. I primarily live and work in Washington, D.C. and thus I will be out of the state of California on November 25, 2024. As such, given my limited participation in the Final Pretrial Conference, my co-counsel and I decided it did not make sense to make our client incur the cost of me traveling to California for the Final pretrial Conference. Additionally, my co-counsel, Bryan M. Sullivan and Zachary C. Hansen, will be appearing in person for the Final Pretrial Conference, so Plaintiff will already have two other attorneys present for this hearing.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on this 21st day of November, 2024, at Washington, D.C.

/s/ Abbe D. Lowell

Abbe D. Lowell

[PROPOSED] ORDER

This Court, having read and considered Plaintiff Robert Hunter Biden's ("Plaintiff") Request for Counsel to Appear Remotely for the November 25, 2024 Final Pretrial Conference ("Request") in this case, and finding good cause therefor, hereby orders as follows:

1. The Request is Granted

2. Plaintiff's Counsel, Mr. Abbe D. Lowell, may appear remotely for the November 25, 2024 Final Pretrial Conference 3:00 p.m. via remote videoconferencing means through the Court's Zoom link on the Court's website.

OR

1. _____

_____.

Dated: _____

Hon. Stephen V. Wilson

UNITED STATES DISTRICT COURT JUDGE